

MITCHELL SILBERBERG & KNUPP LLP A LAW PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

Russell J. Frackman A Professional Corporation (310) 312-3119 Phone (310) 231-8319 Fax rjf@msk.com

May 8, 2017

The Honorable Ronnie Abrams Thurgood Marshall U.S. Courthouse 40 Foley Square New York, NY 10007

Re: Capitol Records, LLC v. Vimeo, Inc./EMI Blackwood Music, Inc. v. Vimeo, Inc., Case Nos. 09-cv-10101 & 09-cv-10105

Dear Judge Abrams:

The parties write jointly to advise the Court of their respective positions in connection with the status conference scheduled for May 11 at 2:00 p.m. The parties have met and conferred, and submit the following points of agreement and disagreement on how the actions should proceed. Essentially, the parties agree as to the remaining issues to be decided in Phase I, but disagree, in part, on the appropriate procedure and timing to decide those issues.

#### I. "RED FLAG" KNOWLEDGE

A. <u>Background</u>: The Second Circuit's decision states that on remand "Vimeo is entitled to summary judgment" under the DMCA safe harbor as to videos for which Plaintiffs showed "no more than that some employee of Vimeo had some contact with a user-posted video that played all, or nearly all, of a recognizable song ... unless plaintiffs can point to evidence sufficient to carry their burden of proving that Vimeo personnel either knew the video was infringing or knew facts making that conclusion obvious to an ordinary person who had no specialized knowledge of music or the laws of copyright." *Capitol Records, LLC v. Vimeo, LLC*, 826 F.3d 78, 97-98 (2d Cir. 2016). On remand, Plaintiffs intend to submit evidence that they



The Honorable Ronnie Abrams May 8, 2017 Page 2

contend is sufficient to defeat Vimeo's motion for summary judgment as to "red flag" knowledge. Plaintiffs estimate that approximately 250 videos out of those previously identified in the schedules to the Initial and Amended Complaints currently fall within this category. Attached are lists of those videos at issue as previously identified in the Initial and Amended Complaints broken down by copyrighted recordings, pre-1972 recordings, and musical compositions. Vimeo intends to challenge any such purported evidence as insufficient to demonstrate "red flag" knowledge as a matter of law.

- **B.** <u>Points of Agreement</u>: The parties agree that the Court will need to resolve whether Plaintiffs' proffered evidence is sufficient to raise a triable issue as to Vimeo's "red flag" knowledge on any videos asserted by Plaintiffs on remand. The parties agree on the following:
  - The Court's resolution of any remaining Phase I "red flag" claims should address all videos designated by Plaintiffs in both the initial and amended schedules at the same time.
  - By <u>Thursday</u>, <u>May 18, 2017</u>, Vimeo will produce to Plaintiffs updated databases of information for certain agreed-upon fields for the videos in the amended schedules.
  - By <u>Thursday, May 25, 2017</u>, Plaintiffs will produce to Vimeo all screenshots and videos, other than videos in the initial schedules, that Plaintiffs allege remain at issue on "red flag" knowledge grounds.
  - Except as provided above, the parties currently do not intend to seek any further Phase I discovery on "red flag" knowledge, although any party may use previous material obtained or provided in discovery and additional material obtained from Vimeo's website, with the opposing party retaining a right to object to such use.
- C. <u>Points of Disagreement</u>: The parties disagree as to the procedure that the Court should adopt for determining whether Plaintiffs' proffered evidence is sufficient to raise a triable issue as to Vimeo's "red flag" knowledge on any videos asserted by Plaintiffs on remand.



The Honorable Ronnie Abrams May 8, 2017 Page 3

#### **Plaintiffs' Proposal**:

- By Monday, June 19, 2017, Plaintiffs will identify any additional videos on the schedules to the Amended Complaints as to which they intend to allege Vimeo's "red flag" knowledge, and will produce to Vimeo all such screenshots and videos.
- By Monday, July 17, 2017, Plaintiffs will file a brief describing the evidence and factual and legal basis in support of "red flag" knowledge as to each video identified as at issue. Plaintiffs propose that the parties include appropriate statements of disputed and undisputed facts.
- By Wednesday, August 16, 2017, Vimeo will oppose Plaintiffs' "red flag" knowledge brief.
- By Monday, August 28, 2017, Plaintiffs will file a reply.

#### Vimeo's Proposal:

- By Monday, June 5, 2017, Plaintiffs will identify which, if any, additional videos as to which it intends to allege Vimeo's "red flag" knowledge, and will produce to Vimeo all such screenshots and videos.
- Plaintiffs will file a submission akin to an Offer of Proof, in which Plaintiffs set forth the factual and/or legal bases for Vimeo's alleged "red flag" knowledge as to each video Plaintiffs intend to pursue on remand. This submission should be filed no later than **Thursday, June 15, 2017**.
- Vimeo will file a response to Plaintiffs' submission to demonstrate that Plaintiffs' supplemental evidence cannot establish "red flag" knowledge as a matter of law. Vimeo's response should be filed no later than <a href="Thursday">Thursday</a>, June 29, 2017.
- No Statements of Disputed or Undisputed Facts should be submitted.
- No further submissions on the "red flag" knowledge issue (including replies or surreplies) should be permitted.

#### II. <u>Unfair Competition</u>

**A.** <u>Background</u>: The Capitol Records Plaintiffs intend to continue pursuing their state-law unfair competition claims as to sound recordings fixed before February 15, 1972. As a



The Honorable Ronnie Abrams May 8, 2017 Page 4

result, Vimeo intends to seek dismissal of the state-law unfair competition claims on various grounds as a matter of law.

**B.** <u>Points of Agreement</u>: The parties agree that Vimeo will move for the dismissal of the Capitol Records Plaintiffs' state-law unfair competition claims, the Capitol Records Plaintiffs will oppose, and Vimeo may reply. The parties agree that discovery is not necessary in advance of this motion, and that if the claims survive they will be subject to Phase II.

**C.** <u>Points of Disagreement</u>: The parties disagree on the schedule that the Court should adopt for briefing Vimeo's motion.

#### Vimeo's Proposal:

Assuming that the Court adopts Vimeo's proposal as to how to proceed on Plaintiffs' remaining "red flag" knowledge claims, Vimeo proposes the following schedule:

• Vimeo's opening brief: Thursday, June 1, 2017

• Capitol Records' opposing brief: Monday, June 19, 2017

• Vimeo's reply brief: Thursday, June 29, 2017

#### **Plaintiffs' Proposal**:

Plaintiffs propose that briefing on Vimeo's motion as to the unfair competition claims be concurrent with Plaintiffs' briefing on "red flag" knowledge as set forth above; specifically:

• Vimeo's opening brief: Monday, July 17, 2017

• Capitol Records' opposing brief: Wednesday, August 16, 2017

• Vimeo's reply brief: Monday, August 28, 2017

### Case 1:09-cv-10105-RA Document 156 Filed 05/08/17 Page 5 of 12



The Honorable Ronnie Abrams May 8, 2017 Page 5

\* \* \*

The parties will be prepared to discuss their respective proposals at Thursday's status conference.

Respectfully submitted,

Respectfully submitted,

/s/ Russell J. Frackman

Russell J. Frackman MITCHELL SILBERBERG & KNUPP LLP 11377 W. Olympic Boulevard Los Angeles, CA 90064 Counsel for Plaintiffs /s/ Robert L. Raskopf\_

Robert L. Raskopf QUINN EMANUEL URQUHART & SULLIVAN, LLP 51 Madison Avenue, 22nd Floor New York, NY 10010 Counsel for Defendants

### Case 1:09-cv-10105-RA Document 156 Filed 05/08/17 Page 6 of 12

Artist	Sound Recording	Vimeo URL
A Perfect Circle	Imagine	http://vimeo.com/10700311
A Perfect Circle	Outsider (Apocalypse Remix)	http://vimeo.com/7952961
Air	Alone in Kyoto	http://vimeo.com/973337
Air	Alone in Kyoto	http://vimeo.com/12158872
Air	Alone in Kyoto	http://vimeo.com/150677
Air	Alone in Kyoto	http://vimeo.com/6337228
Air	Caramel Prisoner	http://vimeo.com/14247202
Air	Cemetary Party	http://vimeo.com/10437744
Air	Dead Bodies	http://vimeo.com/6650695
Air	Femme d'Argent	http://vimeo.com/1893192
Air	Moon Fever	http://vimeo.com/56077778
Air	Playground Love	http://vimeo.com/7428454
Air	Sing Sang Sung	http://vimeo.com/6605514
Air	Venus	http://vimeo.com/141545
Az ft. Nas	How Ya Livin'	http://vimeo.com/7925881
Beastie Boys	14th St. Break	http://vimeo.com/4465214
Beastie Boys	Ch-Check It Out	http://vimeo.com/4194167
Beastie Boys	Freaky Hijiki	http://vimeo.com/2532639
Beastie Boys	Groove Holmes	http://vimeo.com/39392036
Beastie Boys	Here's A Little Something For Ya	http://vimeo.com/31744552
Beastie Boys	Hey Ladies	http://vimeo.com/14617437
Beastie Boys	Intergalactic	http://vimeo.com/14551072
Beastie Boys	Intergalactic	http://vimeo.com/10972547
Beastie Boys	Intergalactic	http://vimeo.com/17661437
Beastie Boys	Intergalactic	http://vimeo.com/4194167
Beastie Boys	Sabotage	http://vimeo.com/936486
Beastie Boys	Sabotage	http://vimeo.com/3112022
Beastie Boys	Sabotage	http://vimeo.com/6543183
Beastie Boys	Sabotage	http://vimeo.com/4194167
Beastie Boys	Sabotage	http://vimeo.com/6937407
Beastie Boys	Suco de Tangerina	http://vimeo.com/5516260
Beastie Boys	Sure Shot	http://vimeo.com/1361586
Bird and the Bee	Man	http://vimeo.com/761320
Bird and the Bee	My Love	http://vimeo.com/3212317
Bird and the Bee	Polite Dance Song	http://vimeo.com/2128833
Black Rebel Motorcycle Club	Spread Your Love	http://vimeo.com/7345582
Black Rebel Motorcycle Club	Spread Your Love	http://vimeo.com/6526960
Blind Melon	No Rain	http://vimeo.com/171330
Blondie	Call Me	http://vimeo.com/239389
Blondie	Call Me	http://vimeo.com/239378
Blondie	Call Me	http://vimeo.com/3491803
Blur	Far Out	http://vimeo.com/6545602
Blur	Girls and Boys	http://vimeo.com/388657
Blur	Tender	http://vimeo.com/10667147
Blur	We've Got A File On You	http://vimeo.com/1222894
Brian Eno	1/2 (Music for Airports)	http://vimeo.com/10697946
Brian Eno	An Ending (Ascent)	http://vimeo.com/10959289

### Case 1:09-cv-10105-RA Document 156 Filed 05/08/17 Page 7 of 12

Artist	Sound Recording	Vimeo URL
Caesars	Jerk It Out	http://vimeo.com/1267564
Caesars	Jerk It Out	http://vimeo.com/1267437
Chemical Brothers	Block Rockin' Beats	http://vimeo.com/1975245
Chemical Brothers	Escape Velocity	http://vimeo.com/17812570
Chemical Brothers	Leave Home	http://vimeo.com/8521676
Chemical Brothers	The Boxer	http://vimeo.com/6939862
Coldplay	42	http://vimeo.com/3649709
Coldplay	42	http://vimeo.com/12497223
Coldplay	Clocks	http://vimeo.com/6792678
Coldplay	Death and all His Friends	http://vimeo.com/2681050
Coldplay	Fix You	http://vimeo.com/370007
Coldplay	Lost	http://vimeo.com/2124101
Coldplay	Lost	http://vimeo.com/7163513
Coldplay	Lovers in Japan/Reign of Love	http://vimeo.com/1202119
Coldplay	Parachutes	http://vimeo.com/622192
		http://vimeo.com/channels/staffpicks/9
Coldplay	Shiver	86065
Coldplay	The Hardest Part	http://vimeo.com/3388154
Coldplay	Yes	http://vimeo.com/5826267
Daft Punk	Aerodynamic	http://vimeo.com/169345
	Around the World / Harder Better Faster	,
Daft Punk	Stronger	http://vimeo.com/2169237
	Around the World / Harder Better Faster	·
Daft Punk	Stronger	http://vimeo.com/788700
Daft Punk	Da Funk	http://vimeo.com/688195
Daft Punk	Harder Better Faster Stronger	http://vimeo.com/322309
Daft Punk	Harder Better Faster Stronger	http://vimeo.com/989866
Daft Punk	Human After All	http://vimeo.com/2308656
Daft Punk	Robot Rock	http://vimeo.com/7836038
Daft Punk	Short Circuit	http://vimeo.com/95564
David Bowie	Fame	http://vimeo.com/6992370
David Bowie	Heroes	http://vimeo.com/55071466
Depeche Mode	Hole to Feed	http://vimeo.com/6772569
Dilated Peoples	Proper Propaganda	http://vimeo.com/1051649
Dilated Peoples	Worst Comes to Worst	http://vimeo.com/11905832
Dilated Peoples	You Can't Hide You Can't Run	http://vimeo.com/9491764
Dilated Feoples	Tod can time for can tixan	http://vimeo.com/channels/juliavids/pa
Doves	Words	ge:2
Empire of the Sun	Walking on a Dream	http://vimeo.com/4411204
Empire of the Sun	Walking on a Dream	http://vimeo.com/8174896
Empire of the Sun	Walking on a Dream	http://vimeo.com/5499876
Fatboy Slim	Don't Let the Man Get You Down	http://vimeo.com/6040221
Fatboy Slim	Praise You	http://vimeo.com/217550
Fatboy Slim	Praise You	http://vimeo.com/2630726
Fatboy Slim		
	Weapon Of Choice	http://vimeo.com/8482051
Gang Starr	The Ownerz	http://vimeo.com/11704460

### Case 1:09-cv-10105-RA Document 156 Filed 05/08/17 Page 8 of 12

Artist	Sound Recording	Vimeo URL
		http://vimeo.com/channels/juliavids/pa
Gorillaz	19-2000	ge:2
Gorillaz	Dirty Harry	http://vimeo.com/1005938
Gorillaz	El Manana	http://vimeo.com/6811171
Gorillaz	Empire Ants	http://vimeo.com/10426428
Gorillaz	Empire Ants	http://vimeo.com/18380241
Gorillaz	Feel Good, Inc.	http://vimeo.com/416510
Gorillaz	Feel Good, Inc.	http://vimeo.com/7238452
Gorillaz	Kids With Guns	http://vimeo.com/18212476
Gorillaz	On Melancholy Hill	http://vimeo.com/16772996
Gorillaz	On Melancholy Hill	http://vimeo.com/10391994
Gorillaz	Orchestral Intro	http://vimeo.com/53180697
Gorillaz	Plastic Beach	http://vimeo.com/11851628
Gorillaz	Stylo	http://vimeo.com/9851483
Gorillaz	Stylo	http://vimeo.com/12007627
Gorillaz	Sweepstakes	http://vimeo.com/11932284
	Welcome to the World of the Plastic	
Gorillaz	Beach	http://vimeo.com/10686983
Hot Chip	Take It In	http://vimeo.com/10290849
Hot Chip	Whistle For Will	http://vimeo.com/9651807
Iggy Pop	China Girl	http://vimeo.com/8940040
Ima Robot	Dangerous Life	http://vimeo.com/5073613
John Lennon	Watching the Wheels	http://vimeo.com/14123590
Katy Perry	California Gurls	http://vimeo.com/12388774
Kottonmouth Kings	Rest of My Life	http://vimeo.com/11146243
Kraftwerk	Tour de France	http://vimeo.com/848959
LCD Soundsystem	All My Friends	http://vimeo.com/2721992
LCD Soundsystem	All My Friends	http://vimeo.com/34874881
LCD Soundsystem	All My Friends	http://vimeo.com/1088670
LCD Soundsystem	Dance Yrself Clean	http://vimeo.com/60986042
Lenny Kravitz	Let Love Rule (Justice Remix)	http://vimeo.com/6923504
Lily Allen	22	http://vimeo.com/4332199
Lily Allen	Back to the Start	http://vimeo.com/5677116
Lily Allen	Everything's Just Wonderful	http://vimeo.com/channels/4882
Massive Attack	Angel	http://vimeo.com/9095851
Massive Attack	Angel	http://vimeo.com/46106624
Massive Attack	Angel	http://vimeo.com/5692603
Massive Attack	Flat of the Blade	http://vimeo.com/9691646
Massive Attack	Heat Miser	http://vimeo.com/735401
Massive Attack	Heat Miser	http://vimeo.com/3570075
Massive Attack	I am Home	http://vimeo.com/4610266
Massive Attack	P is For Piano	http://vimeo.com/16464227
Massive Attack	Paradise Circus	http://vimeo.com/10026960
Massive Attack	Sam	http://vimeo.com/9581288
Massive Attack	Splitting the Atom	http://vimeo.com/12045178
Massive Attack	Teardrop	http://vimeo.com/11379455
Massive Attack	Teardrop	http://vimeo.com/6471883

### Case 1:09-cv-10105-RA Document 156 Filed 05/08/17 Page 9 of 12

Artist	Sound Recording	Vimeo URL
Massive Attack	Teardrop	http://vimeo.com/9950668
Mazzy Star	Fade Into You	http://vimeo.com/605121
Mazzy Star	Fade Into You	http://vimeo.com/1801617
Mazzy Star	Into Dust	http://vimeo.com/5743150
Mazzy Star	Mary of Silence	http://vimeo.com/18936971
Midnight Juggernauts	Into the Galaxy	http://vimeo.com/4063826
Midnight Juggernauts	Shadows	http://vimeo.com/2838390
Missing Persons	Destination Unknown	http://vimeo.com/15314135
Missing Persons	Walking in L.A.	http://vimeo.com/12291175
N.E.R.D.	Fly or Die	http://vimeo.com/7169195
Naughty Boy ft. Emeli Sande	Wonder	http://vimeo.com/49849738
Norah Jones	Carnival Town	http://vimeo.com/10635782
NWA	Straight Outta Compton	http://vimeo.com/10880378
Orchestral Manoeuvres in the	Straight Outta Compton	11110.77 4111100.00111/10000570
Dark	Enola Gay	http://vimeo.com/5570427
Pat Benatar	Heartbreaker	http://vimeo.com/8489482
Penguin Café Orchestra	Perpetuum Mobile	http://vimeo.com/16340475
Pet Shop Boys	You Were Always On My Mind	http://vimeo.com/7152872
Pharoahe Monch	No Mercy	http://vimeo.com/8508191
Phoenix	Long Distance Call	http://vimeo.com/4686796
Phoenix	Napoleon Says	http://vimeo.com/6038910
Pink Floyd	Another Brick in the Wall, pt. 2	http://vimeo.com/1213706
Pink Floyd	Any Colour You Like	http://vimeo.com/333721
Pink Floyd	Breathe	http://vimeo.com/16269442
Pink Floyd	Eclipse	http://vimeo.com/333721
Pink Floyd	Hey You	http://vimeo.com/18351366
Tilk Hoyd	They fou	http://vimeo.com/channels/staffpicks/4
Pink Floyd	Learning to Fly	038064
Pink Floyd	On the Run	http://vimeo.com/8521545
Pink Floyd	Sheep	http://vimeo.com/9365253
Pink Floyd	The Great Gig in the Sky	http://vimeo.com/333721
Pink Floyd	Time	http://vimeo.com/16269442
Pink Floyd	Time	http://vimeo.com/6971734
Radiohead	2+2=5	http://vimeo.com/3708805
Radiohead	Everything In Its Right Place	http://vimeo.com/1252305
Radiohead	Everything in its Right Place	http://vimeo.com/2338853
Radiohead	I Am a Wicked Child	http://vimeo.com/4288206
Radiohead	Idioteque	http://vimeo.com/1875114
Radiohead	Let Down	http://vimeo.com/13489632
Radiohead	Like Spinning Plates	http://vimeo.com/12508169
	<u> </u>	http://vimeo.com/channels/staffpicks/1
Radiohead	Like Spinning Plates	310348
Radiohead	No Surprises	http://vimeo.com/11986171
Radiohead	Pyramid Song	http://vimeo.com/3507601
Radiohead	Pyramid Song	http://vimeo.com/775442
Rolling Stones	Dancing with Mr. D	http://vimeo.com/970647
Smashing Pumpkins	Perfect	http://vimeo.com/7693526
		, , , , , , , , , , , , , , , , , , , ,

### Case 1:09-cv-10105-RA Document 156 Filed 05/08/17 Page 10 of 12

Artist	Sound Recording	Vimeo URL
Snoop Dogg	Hennesey & Buddah	http://vimeo.com/4799412
Snoop Dogg	Pronto	http://vimeo.com/9988607
Telepopmusik	Breathe	http://vimeo.com/8819969
	L'Incertitude d'Heinsenberg (a/k/a	
Telepopmusik	Mathematics)	http://vimeo.com/1577408
The Decemberists	Down by the Water	http://vimeo.com/20851971
The Decemberists	The Crane Wife 3	http://vimeo.com/6147057
The Japanese Popstars ft. Gr	een	
Velvet	Let Go	http://vimeo.com/15425583
The Little Ones	Lovers Who Uncover	http://vimeo.com/9658698
Tinie Tempah	Pass Out	http://vimeo.com/11810876
We Are Scientists	Worth the Wait	http://vimeo.com/302220
Yann Tiersen	Comptine d'un autre ete, l'apres-midi	http://vimeo.com/4722344
Yann Tiersen	La Valse D'Amelie (Version Originale)	http://vimeo.com/3521148
Yann Tiersen	L'Autre Valse d'Amelie	http://vimeo.com/3013257

### Case 1:09-cv-10105-RA Document 156 Filed 05/08/17 Page 11 of 12

Artist	Sound Recording	Vimeo URL
Beach Boys	Barbara Ann	http://vimeo.com/9863624
Beach Boys	Fun Fun	http://vimeo.com/16360541
Beach Boys	God Only Knows	http://vimeo.com/1801617
Beach Boys	God Only Knows	http://vimeo.com/1914129
Beach Boys	I Get Around	http://vimeo.com/11723733
Beach Boys	Surfin USA	http://vimeo.com/3981329
Beach Boys	Wouldn't It Be Nice	http://vimeo.com/195180
Beach Boys	Wouldn't It Be Nice	http://vimeo.com/9333689
Beatles	A Day In the Life	http://vimeo.com/163686
Beatles	Across the Universe (alternate version)	http://vimeo.com/1268623
Beatles	All Together Now	http://vimeo.com/106867
Beatles	All You Need Is Love	http://vimeo.com/264312
Beatles	Baby You're a Rich Man	http://vimeo.com/1334655
Beatles	Back in the U.S.S.R.	http://vimeo.com/207723
Beatles	Birthday	http://vimeo.com/10311486
Beatles	Birthday	http://vimeo.com/10097379
Beatles	Day Tripper	http://vimeo.com/6743203
Beatles	Don't Bother Me	http://vimeo.com/15260530
Beatles	Don't Let Me Down	http://vimeo.com/202585
Beatles	Flying	http://vimeo.com/1453540
Beatles	Helter Skelter	http://vimeo.com/7753547
Beatles	Helter Skelter	http://vimeo.com/5367809
Beatles	I'm Only Sleeping	http://vimeo.com/1785646
Beatles	I'm Only Sleeping	http://vimeo.com/10806448
Beatles	Mean Mr. Mustard	http://vimeo.com/10543353
Beatles	Octopus's Garden	http://vimeo.com/192834
Beatles	Polythene Pam	http://vimeo.com/10543353
Beatles	Rain	http://vimeo.com/10992434
Beatles	Revolution	http://vimeo.com/7280973
Beatles	Roll Over Beethoven	http://vimeo.com/18863487
Beatles	She's Leaving Home	http://vimeo.com/164417
Beatles	Within You Without You	http://vimeo.com/6743128
David Bowie	Rock 'N Roll Suicide	http://vimeo.com/5908057
David Bowie	The Man Who Sold the World	http://vimeo.com/18708782
Les Baxter	Simba	http://vimeo.com/3032986
Louis Prima	Pennies From Heaven	http://vimeo.com/841067
Pink Floyd	Atom Heart Mother	http://vimeo.com/218620
Pink Floyd	See Emily Play	http://vimeo.com/9365253

### Case 1:09-cv-10105-RA Document 156 Filed 05/08/17 Page 12 of 12

## Current List of Videos With Evidence of Vimeo "Interaction": EMI Music Publishing Plaintiffs Schedule A

Musical Composition	Example Artist	Vimeo URL
A Certain Shade Of Green	Incubus	http://vimeo.com/1697528
A Milli	Lil Wayne	http://vimeo.com/3984800
Ain't No Mountain High Enough	Marvin Gaye & Tammi Terrell	http://vimeo.com/2846899
All I Need	Daz Dillinger	http://vimeo.com/5634787
All The Small Things	Blink-182	http://vimeo.com/1889583
B.O.B.	Outkast	http://vimeo.com/150310
Blinded In Chains	Avenged Sevenfold	http://vimeo.com/7862987
Carnival Town	Norah Jones	http://vimeo.com/10635782
Do You Realize?	Flaming Lips	http://vimeo.com/191603
Do You Realize?	Flaming Lips	http://vimeo.com/1914129
Fat Lip	Sum 41	http://vimeo.com/247846
Genie In A Bottle	Christina Aguilera	http://vimeo.com/2021311
Get Down Tonight	KC and the Sunshine Band	http://vimeo.com/13016455
Ghostbusters	Ray Parker Jr.	http://vimeo.com/1421798
Gin And Juice	Snoop Dogg	http://vimeo.com/9950975
Glamorous	Fergie	http://vimeo.com/248786
How Sweet It Is (To Be Loved By You)	Marvin Gaye	http://vimeo.com/11195757
Hypnotize	Notorious B.I.G.	http://vimeo.com/7915036
I Can't Help Myself (Sugar Pie Honey		
Bunch)	The Four Tops	http://vimeo.com/3132300
I Heard It Through The Grapevine	Gladys Knight & the Pips	http://vimeo.com/6199607
I Want You Back	Jackson 5	http://vimeo.com/214019
I Want You Back	Jackson 5	http://vimeo.com/2499578
Love In This Club	Usher	http://vimeo.com/1187654
	Presidents of the United States	
Lump	of America	http://vimeo.com/233299
Man Overboard	Blink-182	http://vimeo.com/8666080
Ms. Jackson	Outkast	http://vimeo.com/874508
My Love	Bird And The Bee	http://vimeo.com/3212317
O.P.P.	Naughty By Nature	http://vimeo.com/7951450
Overnight Celebrity	Twista	http://vimeo.com/222079
	The Presidents of The United	
Peaches	States of America	http://vimeo.com/350903
Theme From S.W.A.T.	Rhythm Heritage	http://vimeo.com/854697
Unwritten	Natasha Bedingfield	http://vimeo.com/130432
You've Got It The Right Stuff	New Kids On the Block	http://vimeo.com/1953283